

UNITED STATES BANKRUPTCY COURT
EASTERN DISTRICT OF NEW YORK

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In re:

Charles Edward Rodgers, Jr.

aka Charles Rodgers,

Case No. 1-19-40975-ess

Chapter 7

HON. Elizabeth S. Stong

Debtor(s).

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NOTICE OF MOTION

PLEASE TAKE NOTICE, that upon the annexed application of attorneys for SELENE FINANCE LP AS SERVICER FOR MTGLQ INVESTORS, L.P. (hereinafter “Movant”), the undersigned respectfully moves this Court for an order, pursuant to 11 U.S.C. § 362(d)(1) and (d)(2) terminating the automatic stay herein as to the lien interest of Movant in real property of the debtor commonly known as 130-07 227TH STREET, LAURELTON, NY 11413 and such other and further relief as to the Court may seem just and proper.

PLEASE TAKE FURTHER NOTICE that this motion shall be returnable on the 5th day of November, 2019 at 10:00 a.m. of that day, or as soon thereafter as counsel can be heard, before the Hon. Judge Elizabeth S. Stong at Conrad B. Duberstein Courthouse, 271-C Cadman Plaza East - Suite 1595, Brooklyn, NY 11201-1800.

PURSUANT TO BANKRUPTCY RULE 9014 AND LOCAL BANKRUPTCY RULE 9006-1(b), IF YOU INTEND TO OPPOSE THE MOTION, YOU MUST SERVE ON MOVANT'S COUNSEL AND FILE WITH THE CLERK OF THE BANKRUPTCY COURT, WRITTEN OPPOSITION TO THE MOTION SO AS TO ENSURE ACTUAL RECEIPT NOT LATER THAN SEVEN (7) DAYS BEFORE THE RETURN DATE.

Dated: September 26, 2019
Westbury, NY

By: /s/ Barbara Whipple
Barbara Whipple, Esq.
Attorneys for Movant
900 Merchants Concourse, Suite 310
Westbury, NY 11590
bwhipple@rasflaw.com

TO:

Charles Edward Rodgers, Jr.
130-07 227th Street
Laurelton, NY 11413

Paul I. Krohn
40 Clinton Street
Suite 1G
Brooklyn, NY 11201

Office of the United States Trustee
Eastern District of NY (Brooklyn Office)
U.S. Federal Office Building
201 Varick Street, Suite 1006
New York, NY 10014

Chamber's Copy
Hon. Elizabeth S. Stong
U.S. Bankruptcy Court
Conrad B. Duberstein Courthouse
271-C Cadman Plaza East, Suite 1595
Brooklyn, NY 11201